

Exhibit B

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

-----X
IN RE TERRORIST ATTACKS ON
SEPTEMBER 11, 2001
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03 MDL 1570 (RCC)

DECLARATION OF JAGAN MOHAN REDDY

I, Jagan Mohan Reddy, declare under penalty of perjury as follows:

1. I received a B.S. (Economics) degree from the London School of Economics in 1969, a M.A. in Business and Applied Economics from the University of Pennsylvania in 1970, and an M.B.A. from the Wharton School, University of Pennsylvania in 1971.

2. From 1971 to approximately 1974 I worked for Citibank, New York. I then worked for the Federal Reserve Bank of New York until 1976. From 1976 to 1991, I worked for Chase Manhattan Bank in New York, Athens, Greece and Bahrain. During part of my tenure at Chase Manhattan Bank, I worked closely with NCB's branch in the United States on a transaction.

3. From 1991 to 2000, I was an employee of NCB and SNCB Securities Inc. (SNCB stood for Saudi National Commercial Bank), which was affiliated with The National Commercial Bank ("NCB") of Saudi Arabia. My responsibilities throughout the time included in part assisting Mr. Sami M. Baarma when he was the Head of Investment Services and Head of the International Department of NCB providing services to NCB clients, including clients that had transactions in the United States. I had an employment contract with SNCB, pursuant to which I received a salary. Sometime around 2000 I ceased being an employee of SNCB and worked directly for only Mr. Baarma personally. This relationship continued until Mr. Baarma's death on March 12, 2005.


4. In 1992, NCB entered into a consent order with the Office of the Comptroller of the Currency, severely curtailing NCB's U.S. operations. Immediately after this enforcement action, a few officers and employees of NCB became officers and employees of SNCB. For all intents and purposes, SNCB began performing all of NCB's U.S. operations except for those restricted by federal regulators. SNCB's sole source of funding was NCB and its only clients were those clients of NCB. Throughout the time that I worked for SNCB, NCB controlled SNCB and used SNCB as an operating division within NCB to perform

NCB's operations in the US that were permitted by US law and restrictions placed on SNCB Securities by various governmental agencies.

5. During my tenure with SNCB and working for Mr. Baarma, I became familiar with the fact that an audit of NCB's financial dealings was done during the 1998 time period. This audit was done outside the routine auditing that was done of NCB and resulted in Saudi authorities taking regulatory and other action to curb further misconduct by certain directors/managers/owners of the bank.

6. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated this 21st day of March, 2007.


JAGAN MOHAN REDDY

SWORN to and subscribed before me
this 21 day of MARCH, 2007.

JOHN J. MOHLMANN
NOTARY PUBLIC
STATE OF NEW JERSEY
MY COMMISSION EXPIRES 02/15/2010
My Comm. Expires: _____

(Seal)

